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January 29, 2025

Via ECF

Hon. Anne Y. Shields
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, NY 11722

Re: *Interiano v. Arch Specialty Insurance Co.*, Case No. 23-cv-0238-PKC-AYS

Dear Judge Shields:

Our firm represents defendant Arch Specialty Insurance Co. ("Arch") in the above-referenced matter. Together with plaintiff Juan Carlos Interiano ("Plaintiff"), we write to jointly request an extension of the fact discovery deadline in this matter from February 27, 2025 to June 6, 2025.

As Your Honor may recall, Plaintiff recently became represented in this matter by new counsel. Plaintiff's new counsel is still in the process of familiarizing themselves with this matter, but that process unfortunately has been delayed as a result of a personal tragedy.

In light of the foregoing, the parties jointly and respectfully request that the Court extend the fact discovery deadline from February 27, 2025 to June 6, 2025. The parties have not previously requested an extension of the fact discovery deadline, and all parties consent to the proposed extension.

Very truly yours,

Aaron F. Mandel

Aaron F. Mandel

cc: All Counsel of Record (via ECF)

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